

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

**TALECRIS BIOTHERAPEUTICS, INC., and  
BAYER HEALTHCARE LLC,**

**Plaintiffs,**

**V.**

**BAXTER INTERNATIONAL INC., and )**  
**BAXTER HEALTHCARE CORPORATION, )**

**Defendants.**

**C.A. No. 05-349-GMS**

## Jury Trial Demanded

**BAXTER HEALTHCARE CORPORATION,** )

**Counterclaimant,**

**V.**

**TALECRIS BIOTHERAPEUTICS, INC., and  
BAYER HEALTHCARE LLC,**

### Counterdefendants.

**PLAINTIFFS' NOTICE OF DEPOSITION OF GERHARD PÖLSLER**

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that beginning on August 31, 2006 at 9:30 a.m., at the Hotel Imperial, Kaerntner Ring 16, Vienna 1015, Austria, counsel for Plaintiffs Talecris Biotherapeutics, Inc. and Bayer Healthcare LLC will take, pursuant to Federal Rules of Civil Procedure 28 and 30, the deposition upon oral examination of Gerhard Pölsler.

The deposition will be taken before an officer authorized to administer oaths and will continue from hour to hour and day to day until completed. You are invited to attend and cross-examine.

Please be advised that this deposition may be recorded by videotape in addition to stenographic recording, which will include the use of LiveNote real time transcription.

Date: August 15, 2006

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/s/ Jeffrey B. Bove

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**CERTIFICATE OF SERVICE**

I, JEFFREY B. BOVE, do hereby certify that I caused a true copy of the foregoing document, **PLAINTIFFS' NOTICE OF DEPOSITION OF GERHARD PÖLSLER**, to be served upon the below listed in the manner indicated on August 15, 2006.

**Via Hand Delivery and E-Mail**

Philip A. Rovner, Esquire  
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By: /s/ Jeffrey B. Bove  
Jeffrey B. Bove (# 998)